Exhibit J

Ariana Lindermayer

From: Lloyd Weinstein < ljw@theweinsteingroup.net>

Sent: Thursday, March 13, 2014 11:37 AM

To: ahmad@NewYorkConsumerAttorney.com; Carolyn E. Coffey; Ariana Lindermayer;

lsglawoffices@verizon.net

Subject: 1:13-cv-05643-ENV-CLP Tuhin v. New York Motor Group LLC et al

Counselors:

Pursuant to conversations and communication with my clients, and in response to the Court's directive made on or about February 26, 2014, this letter shall advise as follows:

- 1. NY Motor Group, LLC and the individuals Mamdoh Eltouby and "Nada" do not have insurance coverage to address the allegations set forth in the Complaint. Upon information and belief, insurance that had been available was cancelled for non-payment by the corporate entity.
- 2. NY Motor Group, LLC has made a search of its records, and confirms that the documents provided pursuant to the initial disclosures were and are the documents in its possession. NY Motor Group, LLC, and the individual Defendants shall make further search, and reserve the right to amend this response, but have advised that the documentation provided to date is the entirety of the documentation that it was able to immediately locate.NY Motor Group, LLC advises that it has neither audio nor video recordings of the transaction with Plaintiff.

The search by Defendants identified above notwithstanding, Defendants expressly reserve the right to amend the foregoing to provide additional information, documentation or things should the same be discovered.

Should you require anything further, please feel free to call upon me.

Respectfully, Lloyd J. Weinstein, Esq.

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<u>PLEASE NOTE: EFFECTIVE December 15, 2013</u> WE HAVE MOVED OUR NEW YORK OFFICES. PLEASE UPDATE YOUR RECORDS ACCORDINGLY. OUR NEW ADDRESS IS: 175 Froehlich Farm Boulevard, Woodbury, New York 11797. Our phone numbers, facsimile numbers and email addresses shall remain the same.